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UNITED STATES DISTRICT COURT

DISTRICT OF OREGON

UNITED STATES OF AMERICA

6:20-mj-00192-MK

v.

**UNITED STATES' MOTION FOR
PROTECTIVE ORDER**

AUSTIN WAYNE REINKE,

Defendant.

The United States of America hereby moves this Court for a protective order pursuant to Rule 16(d)(1) of the Federal Rules of Criminal Procedure, seeking to prevent the dissemination or misuse of discovery material containing sensitive personal identity, and financial information, and Title III wire interceptions. A proposed protective order is filed herewith.

The complaint in this case charges the defendant with conspiracy to possess with intent to distribute, and possession with the intent to distribute, methamphetamine. The discovery material in this case includes very sensitive information, including information regarding individuals who have cooperated with the government in the investigation of the defendant, ongoing law enforcement activities, and sensitive Title III wire information.

In light of the nature of the crime and the information contained in the discovery, the government respectfully requests that the Court order that counsel of record (1) the materials remain under seal and that defendant's attorney make no disclosure of the wire and electronic communications, pleadings or progress reports to any other person, with the exception of the defendant and those persons employed by the attorneys who are necessary to assist defendant's attorney in preparation for trial of the referenced cases; and, (2) defendant's attorney shall not allow defendant to obtain copies of wire and electronic communications, the government's applications for orders authorizing the interception of wire and electronic communications and attached affidavits, the Court's orders issued pursuant to those applications, the government's applications for extensions of such orders and attached affidavits, the Court's orders granting such extensions, and the progress reports required by the Court's orders and the affidavits used in any complaint or search warrant.

The Government has notified defense counsel of its intent to seek this protective order and has not received any objection. Should defense counsel believe it necessary for there to be an exception to the protective order, the government will meet and confer with defense counsel and the parties will then seek guidance from this Court, if necessary. The parties will advise the Court by letter of any exceptions made to the protective order.

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For these reasons, the United States asks that the Court grant this motion and enter the proposed protective order.

DATED: August 20, 2020

Respectfully submitted,

BILLY J. WILLIAMS
United States Attorney

/s/ Joseph H. Huynh
JOSEPH H. HUYNH
Assistant United States Attorney